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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

ROSIE MARHSALL, et al.,

Plaintiffs,

v.

LIBERTY NATIONAL LIFE  
INSURANCE COMPANY,

Defendant.

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CIVIL ACTION NO. 2:05-cv-534-DRB

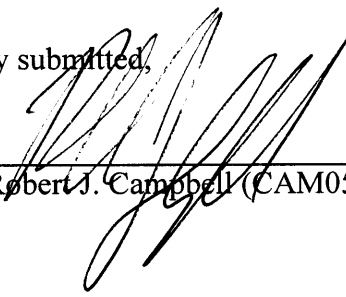
**LIBERTY NATIONAL'S MOTION TO TRANSFER**

Pursuant to 28 U.S.C. § 1404(a), Liberty National moves this Court to transfer this case to the Northern District of Alabama, where two putative nationwide class actions and multiple individual cases asserting virtually identical claims are already pending.

Liberty National relies on the following in support of its motion:

- 1) The Complaint;
- 2) The affidavit of Anthony McWhorter and the attachments thereto (attached hereto as Ex. 1);
- 3) Transfer Order in *Robinson v. Liberty National Insurance Co.*, D.S.C. Case No. 3:01-807-19 (attached hereto as Ex. 2);
- 4) Transfer Orders in: *Hudson v. Liberty National Life Insurance Co.*, Case No. CV-02-D-233-N; *Brown v. Liberty National Life Insurance Co.*, Case No. CV-02-T-232-E; *Gray v. Liberty National Life Insurance Co.*, Case No. CV-02-M-265-N; *Williams v. Liberty National Life Insurance Co.*, Case No. CV-02-T-231-N; *Betton v. Liberty National Life Insurance Co.*, Case No. CV-0140-CG-M; *Bass v. Liberty National Life Insurance Co.*, Case No. CV-03-S-574-N; (attached hereto as collective Ex. 3);
- 5) Transfer Orders in: *Morgan v. Liberty National Life Insurance Co.*, N.D. GA Case No. 02-CV-83HLM; *Arnold v. Liberty National Life Insurance Co.*, N.D. GA Case No. CV-02-0991 (attached hereto as collective Ex. 4).

Respectfully submitted,



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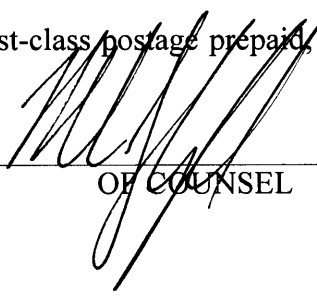
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the above and foregoing on:

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by placing a copy of same in the United States Mail, first-class postage prepaid, on this 28<sup>th</sup>  
day of June, 2005.

  
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